

EXHIBIT 2

From: [David Frankel](#)
To: "Nick Palumbo"
Cc: traceback@legalcallsonly.org
Subject: RE: Traceback of Illegal Calling Campaign - Next Steps
Date: Thursday, June 6, 2019 11:24:16 AM
Attachments: [image002.png](#)

Good morning Nick –

Can you check your network for these calls today please:

Called #	Calling #	Date/Time UTC
413-977-1359	800-325-0889	2019-06-06T14:36:32Z
404-309-3884	828-865-4190	2019-06-06T14:14:35Z
828-400-3720	828-865-4191	2019-06-06T14:17:48Z
856-498-4066	828-865-4192	2019-06-06T14:48:32Z
845-548-8391	917-740-7950	2019-06-06T14:38:17Z

[David Frankel](#)

USTelecom Traceback Team

+1 408 884 1445

From: David Frankel <dfrankel@zipdx.com>
Sent: Wednesday, June 5, 2019 12:39 PM
To: 'Nick Palumbo' <nick@tollfreedeals.com>
Cc: traceback@legalcallsonly.org
Subject: RE: Traceback of Illegal Calling Campaign - Next Steps

That's good, Nick.

Rather than waiting to see what happens tomorrow, could you please be a bit more proactive:

Look at your call records as of now for this customer. See how many calls they are sending per minute, and what their average call duration is, and whether they are using +1 phone numbers for their caller-ID. If they are sending thousands of calls, and their average call duration is less than a minute, we know these are unwanted calls. And if they are using many different +1 phone numbers for caller-ID, then they are illegally spoofing.

I would appreciate it if you could share your findings.

David

[David Frankel](#)

ZipDX® LLC

Monte Sereno, CA USA

Tel: 1-800-FRANKEL (1-800-372-6535)

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From: Nick Palumbo <nick@tollfreedeals.com>
Sent: Wednesday, June 5, 2019 12:13 PM
To: 'David Frankel' <dfrankel@zipdx.com>
Cc: traceback@legalcallsonly.org
Subject: RE: Traceback of Illegal Calling Campaign - Next Steps

I reemed my client out today.

I think it stopped.

Please let me know if you see anything else.

Best Regards,

Nick Palumbo
CEO & Owner
480-305-4028 Direct



[tollfreedeals](http://tollfreedeals.com)



From: David Frankel <dfrankel@zipdx.com>
Sent: Wednesday, June 5, 2019 7:36 AM
To: 'nick palumbo' <nick@tollfreedeals.com>
Cc: traceback@legalcallsonly.org
Subject: RE: Traceback of Illegal Calling Campaign - Next Steps

Nick,

I'm running out of patience.

We need ZERO of these calls coming in. There's no excuse for it. Your customer in India should not be sending ANY calls from +1 numbers unless they've explained to you why they would need to do that.

I can't tell you what to do and I don't like making threats. These calls are very serious violations of federal laws and it shouldn't take multiple days to turn it off. "Waiting for confirmation" isn't something this illegal operator deserves and could, I would think, get you in trouble.

I'm happy to connect on the phone if you want to brainstorm how to be more proactive and

effective on this. Here are 7 more calls, none of which should have happened. These are just examples; the calls are flooding in as you should be able to readily observe from your own records:

Called #	Calling #	Date/Time UTC
240-375-1778	888-242-3601	2019-06-05T14:08:52Z
732-856-2881	828-865-4130	2019-06-05T14:09:46Z
225-978-6107	888-777-9554	2019-06-05T14:09:52Z
908-868-0960	828-865-4131	2019-06-05T14:13:58Z
215-499-5748	828-865-4132	2019-06-05T14:14:25Z
214-394-8539	888-779-4062	2019-06-05T14:15:52Z
210-777-3570	888-634-8641	2019-06-05T14:17:25Z

David

David Frankel

USTelecom Traceback Team

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From: nick palumbo <nick@tollfreedeals.com>

Sent: Wednesday, June 5, 2019 7:20 AM

To: David Frankel <dfrankel@zipdx.com>

Cc: traceback@legalcallsonly.org

Subject: Re: Traceback of Illegal Calling Campaign - Next Steps

I show a 15 percent drop in traffic

Im waiting for confirmation bit it looks like additional action was taken

On Wed, Jun 5, 2019 at 6:52 AM -0700, "David Frankel" <dfrankel@zipdx.com> wrote:

Good morning Nick. Here are a few calls already today – can you confirm [REDACTED] ?

Called #	Calling #	Date/Time UTC
408-510-9558	877-803-6097	2019-06-05T13:32:54Z
718-844-6333	888-084-5234	2019-06-05T13:48:07Z
801-791-4872	888-831-8030	2019-06-05T13:48:34Z

David Frankel

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From: David Frankel <dfrankel@zipdx.com>

Sent: Tuesday, June 4, 2019 9:44 AM

To: 'Nick Palumbo' <nick@tollfreedeals.com>

Cc: traceback@legalcallsonly.org

Subject: RE: Traceback of Illegal Calling Campaign - Next Steps

OK Nick – thanks for checking that for me. Saves us the trouble of tracing them back hop-by-hop.

The calls need to be stopped urgently.

From: Nick Palumbo <nick@tollfreedeals.com>
Sent: Tuesday, June 4, 2019 9:12 AM
To: 'David Frankel' <dfrankel@zipdx.com>
Subject: RE: Traceback of Illegal Calling Campaign - Next Steps

I see those calls from [REDACTED]. I put a call out and also another email out to them this morning.

Awaiting an update.

Best Regards,

Nick Palumbo
CEO & Owner
480-305-4028 Direct



[tollfreedeals](http://tollfreedeals.com)



From: David Frankel <dfrankel@zipdx.com>
Sent: Tuesday, June 4, 2019 7:44 AM
To: 'nick palumbo' <nick@tollfreedeals.com>
Subject: RE: Traceback of Illegal Calling Campaign - Next Steps

Hi Nick –

Thanks for that report. Can you please look at a few of these calls from this morning and tell me if they are coming via you?

TO:	FROM:	TIME UTC:
850-673-6367	800-934-5665	2019-06-04T14:25:25Z
254-537-2148	800-718-3215	2019-06-04T14:19:28Z
270-315-2624	800-362-9105	2019-06-04T14:18:43Z
616-589-9945	828-865-3081	2019-06-04T14:14:36Z
901-581-8865	800-560-5454	2019-06-04T14:12:42Z
813-481-5127	800-720-0157	2019-06-04T14:09:58Z
828-450-1518	828-865-3082	2019-06-04T14:08:16Z

I did not get any response from [REDACTED] to my note.

David

From: nick palumbo <nick@tollfreedeals.com>

Sent: Tuesday, June 4, 2019 7:14 AM

To: David Frankel <dfrankel@zipdx.com>

Subject: Re: Traceback of Illegal Calling Campaign - Next Steps

My morning report shows 5 percent less traffic running from them. It looks like that one client has been pulled from routing.

On Mon, Jun 3, 2019 at 8:19 PM -0700, "David Frankel" <dfrankel@zipdx.com> wrote:

Hello!

I got your contact info from Nick Palumbo at Toll Free Deals.

As I think he explained to you, we traced a number of automated calls today to you. Those calls are examples from an illegal calling campaign that has blasted millions of calls to USA consumers.

We have an on-going program to identify and trace these illegal calls to identify the source so that they can then be stopped. We appreciate you taking action to stop these calls.

Please reply to this email with the identity of your customer that is responsible for these calls. That will help us in working to prevent the same illegal activity from resuming via an alternate path.

Also, going forward, we would ask that you take steps to prevent your clients (existing and new) from making illegal calls to USA. There is a box at the end of this article that lists some of the things that make calls illegal.

<https://legalcallsonly.org/white-paper-source-mitigation-of-illegal-robocalls/>

In particular, you should not permit customers to have access to high-volume calling capability, and to use any calling number of their choosing (and especially +1 telephone numbers). Only under special circumstances would a legitimate caller need this.

If you do grant access to high-volume calling, please make sure you have a valid business name and registration, physical address, a web site for the business, and names of executives with professional email addresses along with telephone numbers. Also record the justification for high-volume calling (and caller-ID spoofing if you grant that capability). This will be important if problems do arise. It will also be important for you to monitor your customers' traffic to make sure they stay in compliance.

Thanks for your help and please let me know if you have any questions or feedback. I look forward to your response with the identity of the customer responsible for these particular calls.

[David Frankel](#)

USTelecom Traceback Team